Neal, Arthur

From: javery@drec.msstate.edu

Sent: Thursday, March 30, 2006 10:35 AM

To: NOSB Livestock

Subject: Comments of Aquaculture Working Group Interim Final Report

Attachments: ATTACHMENT.TXT

Date: March 30, 2006
<!--[if !supportEmptyParas]--> <!--[endif]-->
To: National Organic Standards Board (NOSB)
<!--[if !supportEmptyParas]--> <!--[endif]-->
From: Dr. Jimmy Avery, Extension Professor
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<!--[if !supportEmptyParas]--> <!--[endif]-->
SUBJECT: COMMENTS ON NOSB AQUACULTURE WORKING GROUP INTERIM FINAL REPORT
<!--[if !supportEmptyParas]--> <!--[endif]-->
I support the recommended standards for the production of organic aquaculture products as identified in the Interim Final Rule of the Aquaculture Working Group (AWG).
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Catfish production is the single largest segment of aquaculture production in the United States producing over 600 million pounds in 2005. While it remains uncertain how many catfish producers may opt for organic production, it is vitally important that this industry have the option to participate. Research conducted at the National Warmwater Aquaculture Center indicates that while organic production is possible with only minor losses of production, cost will be an issue. The obvious hurdles are organic feedstuffs and elimination of the few therapeutics that are registered for foodfish use. While the issue of fish meal still remains the single largest hurdle for several species of finfish, many of the other production systems should be able to modify their production practices to meet the standards.
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The concept of delaying the onset of continuous organic management until fish have reached 5% of total market weight would be beneficial for organic catfish production. This would allow the producer more flexibility in the management of fungal and bacterial diseases during the egg and fry stages.
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The AWG was thorough in its consideration of the various species and production systems used in aquaculture (with the noted exception of bivalve molluscan shellfish). However, the Executive summary dealt mostly with procedural matters and description of the Board. I suggest that the Executive summary be re-written to discuss the Board's justification of two separate options in the rule.